

Serial No.: 10/027,610

Attorney Docket No.: 01P04874US

REMARKS

Upon entry of the instant Amendment, Claims 1-20 are pending. Claim 20 has been added to more particularly point out Applicant's invention.

Claims 1, 5, and 11 were rejected under 35 U.S.C. 102(e) as being anticipated by Palat et al., U.S. Patent Application No. 2010034231 ("Palat"). In order for there to be anticipation, each and every element of the claimed invention must be present in a single prior reference. Applicants respectfully submit that the claimed invention is not taught, suggested, or implied by Palat.

As discussed in the Specification and in Response to the previous Official Action, one aspect of the present invention relates to a system and method for providing multimedia content in a GPRS network. Accordingly, in one embodiment of the invention, a Session Initiation Protocol (SIP) application server is connected to an SGSN/gprsSSF by a SIP User Agent (UA). The SIP UA supports the SIP protocol. The system is implemented by reusing a GPRS Attach/Detach Finite State Model and a GPRS PDP Finite State Model. When relevant detection points in these state models are encountered, the SGSN provides an indication to the SIP User Agent, which will determine the necessary action, i.e., trigger the network event to the SIP Application Server with SIP request.

Thus, claim 1 recites "wherein said SGSN includes a Session Initiation Protocol (SIP) user agent for interfacing to a SIP application server, to provide multimedia services to said mobile station;" claim 5 recites "wherein said SGSN includes a Session Initiation Protocol (SIP) user agent. . . and a SIP application server, said SIP user agent and said SIP application server adapted to provide multimedia services to said mobile station;" and claim 11 recites "providing a SIP application server, said SIP user agent and said SIP application server adapted to provide multimedia services to said mobile station."

In contrast, as discussed in response to the previous Official Action, Palat merely

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provides for a "VC-SGSN" 30 in which an SGSN and a "voice service box" are combined in a common unit. Palat, however, does not appear to provide for a multimedia feature such as a SIP user agent or, indeed, a SIP application server.

Paragraph 3 of the Official Action states "the combination of an SGSN and a voice service box was disclosed in Palat. And the combination clearly provides the voice service, that is, the multimedia service, to the mobile device. Therefore, the examiner stands for the current rejections." Assuming this to be a correct characterization of Palat, Applicant respectfully submits that this is an insufficient basis for an anticipation rejection. It is axiomatic that, in order for there to be anticipation, each and every element of the claimed invention must be present in a single prior reference. That is, each and every element must be identically disclosed. While Palat provides some kind of "voice service box," Palat contains not one word regarding providing a Session Initiation Protocol (SIP) user agent or server in an SGSN, or providing SIP services in such an environment, as generally recited in the claims at issue. Since a Session Initiation Protocol user agent is not provided, there can be no anticipation.

Thus, Palat does not appear to relate to providing multimedia content using SIP in a GPRS network. As such, the Examiner is respectfully requested to reconsider and withdraw the rejection.

Claims 2-3, 6-10, and 12-16 have been rejected under 35 U.S.C. 103 as being unpatentable over Palat in view of Verkama, U.S. Patent Application No. 20010050908 ("Verkama"). Applicant respectfully submits that these claims are not taught, suggested, or implied by Palat or Verkama, either singly or in combination. Palat has been discussed above. Verkama is relied on for allegedly providing "SGSN adapted to initiate a PDP context activation procedure." However, like Palat, Verkama has nothing to do with a SIP environment in a GPRS network. Because Verkama does not overcome the deficiencies of Palat, its combination with Palat likewise cannot render the claimed invention obvious. As such, the Examiner is respectfully requested to

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reconsider and withdraw the rejection.

Claims 17-19 have been rejected under 35 U.S.C. 103 as being unpatentable over Verkama in view of Schneider et al., U.S. Patent Application No. 20020071427 A1, ("Schneider"). Applicants respectfully submit that the claimed invention is not taught, suggested, or implied by Verkama or Schneider, either singly or in combination.

As an initial matter, the Official Action states that "it is well known in the art that SIP application servers are widely used in GPRS networks, the environment as stated in Verkama." As discussed above, however, this is a mischaracterization of the "environment" of Verkama. Further, whether something *is* widely known (at a date more than five years after the filing of the application) is not the standard for patentability; the standard is whether art *was* known, at the time of the invention. The examiner is thus requested to provide supporting documentation for this assertion.

More particularly, claim 17 recites, inter alia, "pushing content to said mobile station from a SIP application server." Thus, like the other independent claims, claim 17 recites use in a SIP environment. While Verkama relates to a GPRS network, like Palat, Verkama has nothing to do with such an environment. While Schneider provides a SIP proxy agent, Schneider does not provide for use in a GPRS environment and, indeed, the only motivation the Official Action provides for making the combination is the bald assertion that "SIP application servers are widely used in GPRS networks" or perhaps, improper use of hindsight. As such, the Examiner is respectfully requested to reconsider and withdraw the rejection.

Newly added claim 20 is similar to claim 1, and also recites a CAMEL service environment. Applicant respectfully submits that none of the references provide for SIP and CAMEL services in a GPRS network, as generally recited in the claim at issue. As such, claim 20 is likewise believed allowable.

For all of the above reasons, Applicants respectfully submit that the application is in condition for allowance, which allowance is earnestly solicited.

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Respectfully requested,

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